

United States Courts
Southern District of Texas
FILED

January 28, 2025

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

Plaintiff

v

(1) TREVOR RICHARD NEILL

Defendant

4:25-cr-00027

INDICTMENT

**COUNTS 1 & 2: Impersonating a
Government Official, 18 U.S.C. § 912;**

**COUNTS 3 & 4: False Documents, 18
U.S.C. § 1001;**

**COUNTS 5 & 6: Aggravated Identity
Theft, 18 U.S.C. § 1028A**

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment:

1. The United States Attorney's Office for the Southern District of Texas was a component of the United States Department of Justice, a department of the United States Government.
2. Defendant Trevor Richard Neill was employed by the United States Attorney's Office for the Southern District of Texas as an information technology specialist.
3. As an employer, the United States Government will provide paid leave for its civilian employees who also serve military reserve duty.
4. Defendant Trevor Richard Neill had served in the United States Army Reserve until being honorably discharged effective December 22, 2020.

5. Defendant Trevor Richard Neill operated an on-line sales business under the name “Schoolhouse Snacks.”

COUNT ONE
[18 U.S.C. § 912]

Paragraphs 1, 2, and 5 of the Introduction to this Indictment are incorporated herein as if fully restated.

On or about January 2, 2024, in the Southern District of Texas, Defendant,

(1) TREVOR RICHARD NEILL,

did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is an assistant United States Attorney, and in such assumed and pretended character did act as such, in that he falsely stated that he was an assistant United States Attorney in a letter mailed in an envelope of the United States Attorney’s Office for the Southern District of Texas to a competitor of Schoolhouse Snacks, known to the Grand Jury but identified herein only as WG, LLC, threatening WG, LLC, with legal action and demanding that it “remove all unauthorized product from your store”.

In violation of Title 18, United States Code, Section 912.

COUNT TWO
[18 U.S.C. § 912]

Paragraphs 1, 2, and 5 of the Introduction to this Indictment are incorporated herein as if fully restated.

On or about January 2, 2024, in the Southern District of Texas, Defendant,

(1) TREVOR RICHARD NEILL,

did falsely assume and pretend to be an officer and employee of the United States acting under the authority thereof, that is an assistant United States Attorney, and in such assumed and

pretended character did act as such, in that he falsely stated that he was an assistant United States Attorney in a letter mailed in an envelope of the United States Attorney's Office for the Southern District of Texas to a competitor of Schoolhouse Snacks, known to the Grand Jury but identified herein only as L.S.C. c/o WG, LLC, threatening L.S.C. and WG, LLC, with legal action and demanding that L.S.C. and WG, LLC, "remove all unauthorized product from your store".

In violation of Title 18, United States Code, Section 912.

COUNT THREE
[18 U.S.C. § 1001]

Paragraphs 1, 2, 3, and 4 of the Introduction to this Indictment are incorporated herein as if fully restated.

On or about March 4, 2021, in the Southern District of Texas, Defendant,

(1) TREVOR RICHARD NEILL,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by providing what he purported to be Orders for military reserve duty to the U.S. Attorney's Office systems manager which falsely stated that he had been ordered to report for 5 days of military reserve duty beginning March 15, 2021, well knowing and believing that he had been discharged from the military reserves and that such Orders had been fabricated, in an effort to obtain leave to which he was not entitled.

In violation of Title 18, United States Code, Section 1001.

COUNT FOUR
[18 U.S.C. § 1001]

Paragraphs 1, 2, 3, and 4 of the Introduction to this Indictment are incorporated herein as

if fully restated.

On or about June 22, 2021, in the Southern District of Texas, Defendant,

(1) TREVOR RICHARD NEILL,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by providing what he purported to be Orders for military reserve duty to the U.S. Attorney's Office systems manager which falsely stated that he had been ordered to report for 5 days of military reserve duty beginning July 12, 2021, well knowing and believing that he had been discharged from the military reserves and that such Orders had been fabricated, in an effort to obtain leave to which he was not entitled.

In violation of Title 18, United States Code, Section 1001.

COUNT FIVE
[18 U.S.C. § 1028A]

On or about March 4, 2021, in the Southern District of Texas, Defendant,

(1) TREVOR RICHARD NEILL,

did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit making and using a false document in violation of 18 U.S.C. § 1001, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT SIX
[18 U.S.C. § 1028A]

On or about June 22, 2021, in the Southern District of Texas, Defendant,

(1) TREVOR RICHARD NEILL,

did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit making and using a false document in violation of 18 U.S.C. § 1001, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL

Original Signature on File

FOREPERSON OF THE GRAND JURY

JAMES R. McHENRY, III
ACTING UNITED STATES ATTORNEY GENERAL

BY:



WILLIAM R. HARRIS
Special Attorney to the Attorney General
Pursuant to 28 U.S.C. § 515(a)